SECTION 5

APPENDICES

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JURISDICTIONS WITH 51 PERCENT OR GREATER LMI POPULATION

(Based On HUD's 2000 Census Data)

NAME	LMI Population	TOTAL Population	LMI Percentage
Almira	173	321	53.9
Benton City	1,318	2,533	52.0
Bingen	435	652	66.7
Brewster	1,520	2,125	71.5
Bridgeport	1,453	2,099	69.2
Bucoda	404	648	62.3
Chelan	1,923	3,532	54.4
Chewelah	1,155	2,129	54.3
Clarkston	3,894	7,067	55.1
Cle Elum	922	1,787	51.6
Conconully	124	209	59.3
Concrete	497	832	59.7
Connell	1,375	2,403	57.2
Coupeville	875	1,610	54.3
Creston	121	230	52.6
Cusick	150	211	71.1
Ellensburg	8,027	13,234	60.7
Entiat	502	959	52.3
Everson	1,059	2,043	51.8
George	368	510	72.2
Goldendale	1,996	3,665	54.5
Grand Coulee	506	878	57.6
Granger	1,811	2,586	70.0
Hamilton	194	330	58.8
Hartline	79	142	55.6
Hatton	65	118	55.1
Hoquiam	4,724	8,977	52.6
Ione	302	506	59.7
Kahlotus	143	257	55.6
Kelso	6,133	11,730	52.3
Kettle Falls	838	1,553	54.0
Kittitas	708	1,130	62.7
Krupp	47	78	60.3
Lamont	66	91	72.5
Long Beach	707	1,268	55.8
Mabton	1,279	1,911	66.9
Malden	139	213	65.3
Mattawa	2,029	2,703	75.1

JURISDICTIONS WITH 51 PERCENT OR GREATER LMI POPULATION

NAME	LMI Population	TOTAL Population	LMI Percentage
Mesa	269	441	61.0
Metaline	118	179	65.9
Metaline Falls	118	199	59.3
Mossyrock	253	463	54.6
Nespelem	107	165	64.8
Newport	1,093	1,808	60.5
Northport	212	343	61.8
Oak Harbor	12,622	19,797	63.8
Oakville	346	640	54.1
Okanogan	1,240	2,281	54.4
Omak	2,482	4,461	55.6
Oroville	1,005	1,630	61.7
Othello	3,172	5,700	55.6
Pe Ell	391	688	56.8
Pullman	11,621	19,792	58.7
Quincy	2,951	5,116	57.7
Raymond	1,516	2,754	55.0
Republic	558	978	57.1
Riverside	217	349	62.2
Rock Island	467	883	52.9
Royal City	1,133	1,840	61.6
Sequim	2,109	4,086	51.6
Soap Lake	1,082	1,695	63.8
South Bend	963	1,809	53.2
Springdale	202	316	63.9
Starbuck	85	115	73.9
Sumas	572	965	59.3
Sunnyside	8,704	13,869	62.8
Tenino	829	1,448	57.3
Tieton	590	1,131	52.2
Toledo	312	612	51.0
Tonasket	557	880	63.3
Toppenish	5,799	8,781	66.0
Union Gap	2,806	5,479	51.2
Vader	344	617	55.8
Wapato	3,182	4,575	69.6
Warden	1,462	2,540	57.6
Wilson Creek	147	201	73.1
Winthrop	177	324	54.6
Yelm	1,693	3,303	51.3

APPENDIX C

COMMUNITY SURVEY GUIDE

A Step-By-Step Survey Process For Determining Income Levels And Assessing Needs Of Low- And Moderate-Income Persons

Introduction

This guide outlines a step-by-step survey process for determining income levels and assessing the needs of low- and moderate-income (LMI) persons. It is to be used by local officials, staff, and volunteers working for jurisdictions that are eligible to apply for funding through the Community Development Block Grant (CDBG) Program. It contains instructions necessary for a jurisdiction to develop, administer, and document a statistically valid income survey and to determine whether a service area or target population will meet CDBG Program requirements related to LMI benefits. It also contains instructions for conducting a community needs survey, as a separate process or in tandem with an income survey.

An income survey is required of any applicant submitting a project proposal that provides area benefit, unless US Department of Housing and Urban Development (HUD)'s 2000 Census data already show the service area consists of over 51 percent LMI persons. The survey determines the percentage of LMI persons in the community. The minimum percentage of LMI benefit required of an area benefit project is 51 percent.

An income survey conducted since January 2001 may be used to meet this requirement if the applicant can demonstrate that the survey results are still current and representative of the community. This may be accomplished by documenting that population size, demographics, unemployment rate, and employment has remained nearly the same since the survey. Sources of documentation include: hospitals, realtors, local employers, the Office of Financial Management, and/or the Department of Employment Security.

A community proposing a project that will provide direct benefits to persons or households who are individually qualified on the basis of income prior to receiving the service is not required to conduct an income survey. Instead, the benefit requirement of the program is met by the type of activities and services proposed and the commitment on the part of the applicant to screen beneficiaries for income eligibility prior to delivering the service.

The CDBG Program places emphasis on the identification and prioritization of the community development needs of LMI persons. In some cases, an applicant may choose to conduct a combined income and community needs survey to simultaneously demonstrate LMI priority needs and the percent benefit that would be achieved if activities were proposed in the CDBG application to address them.

Definitions

The following definitions explain terms that are used throughout this survey guidebook:

A. Low- and Moderate-Income (LMI) Persons

For the purposes of evaluating and rating CDBG applications, a “LMI person” is defined as one whose income is no more than 80 percent of the median family income for the county. Refer to Appendix B: 2006 Income Limits.

B. Area Benefit Project

Benefits provided to LMI persons by a CDBG project may be either area or direct. Area benefit activities meet the identified needs of all households within a clearly defined service area or jurisdiction, and at least 51 percent of the persons meet the LMI criteria. Development of a park or construction of a municipal sewage treatment plant to benefit a community or neighborhood with a high percentage of LMI persons are examples of projects that provide area benefits. Any applicant submitting a project proposal that provides area benefit may either use HUD’s Census data or conduct an income survey.

C. Direct Benefit Project

Direct benefit activities clearly focus on benefiting LMI persons or members of eligible special groups rather than all residents of a particular area. A housing rehabilitation project providing loans to LMI homeowners, or a daycare facility that serves principally LMI families are examples of direct benefit activities.

D. Universe

The universe is the total number of people/households within the entire benefit area that is to be served by the project or activity. A portion of the entire benefit area with a heavy concentration of LMI households cannot be singled out as a target area.

E. Sample Group

A sample group is a number of households that have been randomly selected from a universe. Random selection of an adequate-sized sample group ensures that it is representative of the universe from which it has been drawn. Estimates are made about the universe from the sample group. By asking carefully framed questions and interpreting them correctly from an adequate-sized randomly drawn sample, surveyors can be assured that the overall estimates have a reasonable degree of accuracy. For instance, assume that the universe is a community containing about 400 homes. By sampling a <u>portion</u> of the 400 households residing within that community, estimates may be made about the incomes or needs of <u>all</u> residents of the 400 households.

F. Total Household Income

Total Household Income is all gross wages, tips, and salaries earned by all members of the household in the previous 12 months.

Step One: Appoint Survey Coordinator

The first step of a survey process is to recognize that a survey will typically take planning, coordination, and effort over a period ranging from several days to several months depending on the goals of the survey process and the size of the population or target area to be surveyed. To ensure that the effort yields statistically valid results, it is recommended that a survey coordinator be appointed to lead the process and provide oversight through all steps, from beginning to end. An applicant community has several options available for selecting and appointing a survey coordinator. It may be possible to use an existing member of the jurisdiction's administrative, planning, community development, or public works department staff. It may also be possible to recruit a volunteer to serve as the coordinator. In some cases, a community may choose to hire a consultant to oversee and conduct the survey process, although the steps outlined in this guidebook are designed for people who have no prior survey expertise. Many communities have used resources available to them through local community colleges and universities. Some instructors and professors will take on a community survey as part of their planning or social services curriculum. What is important at this stage is: to obtain a commitment from the person selected to see the process through; to be clear about expectations of the job; and to establish effective communication channels with local elected officials.

Step Two: Define Survey Universe

Step two of the survey process is designed to yield a definition of the survey universe. Completion of this step is dependent on identifying: the goal or goals of the survey; the physical boundaries of the geographic area to be surveyed or the characteristics of the total population to be surveyed; and the households that exist within the defined geographic area or meet the demographic characteristics of the target population.

A. Identify goals of the survey process.

Each applicant must choose from among at least three possible survey goals that are:

1) To determine incomes of a community, service area, or target population, 2) to determine community development and housing needs of a community, or 3) to determine incomes and needs of a community.

If the goal is to determine incomes of a community, service area, or target population, the process will unfold as an income survey. This is an appropriate choice if the community has already defined the needs of the community and its LMI population and is attempting to demonstrate the area benefit of the priority activities it intends to propose as part of the CDBG application.

If the goal is to determine community development and housing needs, the process will unfold as a need survey. This is an appropriate choice if the applicant is prepared to conduct a second survey should the needs survey identify area benefit activities as the priorities for a CDBG application. In this case, it is generally assumed that priority needs and service areas have not yet been identified. In some cases, it is also an appropriate choice if the community anticipates that the survey will demonstrate the need for a direct benefit project proposal, which does not require an income survey.

If the goal of the survey is to assess the housing and community development needs of the community while at the same time determining incomes of residents community-wide, a combined income and needs survey process will be necessary. This is an appropriate choice if priority needs are not known and the community intends to conduct only one survey. To accomplish a combined survey, care must be taken to build in neighborhood designations or other indicators of demographic characteristics that can be used to define the service area or target population prioritized activities will ultimately benefit. Color-coding surveys from designated neighborhoods is one method to distinguish survey results.

B. Identify geographic boundaries or population characteristics of the survey universe.

The geographic boundaries or populations that define the survey universe will vary depending on the goals of the survey process. When priority needs and activities have been identified and an income survey is planned to determine area benefit, the proposed activities determine the geographic area or characteristics of the population that should be included in the survey universe. For example, if the priority activity is a senior center, it follows that the survey universe should include all residents of the community who are senior citizens (age 62 or older.) If the priority need is water system improvements that will exclusively benefit a specific neighborhood, then the survey universe should include the entire geographic area of the neighborhood. If the priority need is a sewer system that will benefit the entire jurisdiction, then the geographic boundaries of the survey universe should include the entire jurisdiction. In this case, the survey universe must conform to geographic boundaries of the service area, or the unique characteristics of the population that will receive services.

When the goal of the survey is to determine needs, the survey universe should correspond to the geographic boundaries of the jurisdiction.

When the goal of the survey is to simultaneously determine needs and incomes community-wide, the survey universe must correspond with the geographic boundaries of the jurisdiction.

C. Identify households within the survey universe.

To complete the process of defining the survey universe, all households in the community, service area, or target population must be identified. A method for identifying the households in a universe must be developed in order to draw a sample group. Ideally, a list of each person living in a universe and their telephone number is available. If a list is available, devise a procedure to randomly select households to be interviewed. If a list is not available, the following resources may be useful for identifying all households in the survey universe:

1. City indexes, if available and up-to-date, usually provide the best source of household information suitable for selecting samples.

2. Reverse directories are potential sources for obtaining sampling information. They help to eliminate households that are located outside a service area.

3. Telephone books are also a potential source for obtaining sampling information. However, people without telephones or those who have unlisted numbers would be excluded from a sample, unless additional tools are used.

4. Tax rolls are another potential source of addresses. The limitation of tax rolls is that they identify only property owners, not the residents. Since property owners and residents may not be the same, additional research will be necessary. Also, tax rolls identify only building addresses, not specific household addresses. For instance, apartment buildings will be listed by address while individual apartments within the building need to be identified for sampling purposes. Tax rolls identify locations for interviews, but cannot be used as the basis of a mail or telephone survey unless a reverse directory is used.

5. Consideration must be given to multiple unit residences, such as apartment buildings, which may have only one billing address but represent several households to be surveyed.

If the survey universe is smaller than the entire jurisdiction, then the service area households or target population households will need to be extracted from the above sources based on addresses. If the survey universe is a target population, it is also often possible to involve other service providers in identifying the number and location of households. In some cases, if the survey universe is a target neighborhood, it is possible to actually walk through the neighborhood and inventory all households.

When planning a combined income and needs survey, it is important to identify households by neighborhood.

Step Three: Select Survey Sample From The Households Within The Universe

Once the survey universe has been defined, the next step is to select a survey sample of households within the survey universe. To complete this step, it is necessary to: determine the appropriate sample size; establish a process to replace unreachable and other non-response households; and draw the survey sample.

A. Determine sample group size needed to generate the minimum number of required responses.

After all households have been identified, the next step is to determine the sample group size needed to generate the minimum number of responses required for a CDBG income survey. If a jurisdiction does not obtain the minimum number of responses, the activity for which the benefit is claimed will be eliminated, or the entire application may not pass threshold review and will not be accepted for rating and selection.

To help determine sample group size, use Table A, “Required Sample Sizes For Universes of Various Sizes.” Listed in Column A are the universe sizes. Listed in Column B are the sample group sizes or the minimum number of needed responses. A hypothetical 400 household neighborhood is used to illustrate the use of this table. Under "Number of Households in the Universe," locate line 399 to 650 households. The number of complete responses required in the sample is 250. (See Attachment 1, Discussion of Sample Size, page 120, for an explanation of how these samples were determined.)

TABLE A
Required Sample Group Sizes For Universes of Various Sizes

Column A Number of Households in the universe	***Column B*** Sample Group Size Needed to Complete Responses Required
1-49	1-49 (100%)
50-55	50
56-63	55
64-70	60
71-77	65
78-87	70
88-99	80
100-115	90
116-133	100
134-153	110
154-180	125
181-238	150
239-308	175
309-398	200
399-650	250
651-1,200	300
1,201-2,700	350
2,701 or more	400

B. Establish a process to replace unreachable and other non-response households within the sample.

The sample group sizes listed in Table A indicate the number of interviews that must be completed, not necessarily the number of households that will need to be contacted. They are distinctly different and rarely are they the same number. No matter what is attempted, some households will not be home during the periods set aside for interviewing, some will refuse to be interviewed, some will terminate the interview before it is completed, and some will complete the interview but fail to provide an answer to the key question on income level. **To be considered a completed interview for CDBG purposes, the interview must include complete and accurate information on the respondent's income level.**

Table B indicates the usual rates of response that can be expected from a variety of survey instruments. For example, when conducting a door-to-door survey in a 400-household neighborhood, a sample of 278 to 333 households (250 divided by .90 or .75) should be drawn to obtain 250 completed interviews. Over-sampling is one way to deal with unreachable households and other non-response situations.

TABLE B
Expected Response Rates For
Different Types of Surveys

Expected Survey Type	Rate of Response
Mail	25 - 50%
Mail, with letter follow-up	50 - 60%
Mail, with telephone follow-up	50 - 80%
Telephone	75 - 90%
Door-to-Door	75 - 90%

C. Draw Samples.

To acquire a good sample of the universe, everyone in the universe needs to have an equal chance of being included in the sample. To ensure an equal chance, a random sample may be drawn using a random numbers table. (See Attachment 2, Instructions For Using A Random Numbers Table and the Random Numbers Table, page 121.) A random numbers table is a computer-generated list of random numbers that can be used in a variety of ways. When using a random numbers table, a sample is drawn from the universe using the numbers appearing on the table. If, for example, the first three random numbers from the table are 087, 384, and 102, the 87th, 384th, and 102nd households from the universe listing will be included in the sample to interview. Continue until the desired sample size is achieved.

As indicated above, it is advisable to over-sample. When unreachable households and other non-response situations are encountered, they may be replaced with households in the over-sample list in the order replacements were selected. For example, if a list of 300 households is drawn in an effort to obtain 250 interviews, the first household written off as "unreachable" should be replaced by the 251st household in the sample.

If a listing is unavailable of all the households in a service area, but the geographic boundaries can be defined, a starting location may be randomly selected and the selection process may proceed systematically from there. For example, in referring back to the hypothetical 400 household neighborhood needing a sample group of 250 households, every 1.6th household (400 divided by 250) should be interviewed to ensure that the entire neighborhood has been sampled. In whole numbers, this works out to about 2 of every 3 households. Therefore, the interviewer can start at one end of the neighborhood and proceed systematically through the entire neighborhood interviewing two households and then skip one. If an interview is not possible, the next household that would have been skipped should be interviewed. Therefore, when the sample group size calls for one of every six households to be sampled, a random number from one to six can be drawn, with the interviewer starting at that household seeking interviews at every sixth household. Unreachables can be replaced with every third household in the six household groups. Statistically valid results will be obtained if households are not too quickly written off as unreachable. Randomness is most certain if interviews are conducted from the households first selected. Thus, if a door-to-door survey is being conducted, two or more passes through the area (at different times) should be attempted.

Frequently respondents will be busy, but will say that they can do the interview later. An appointment should be made to return and complete the interview. Only after at least two tries or an outright refusal should a sampled household be replaced. With a telephone survey, attempt three calls before replacing a household.

Step Four: Select Survey Method

Those conducting the survey should decide which survey method or combination of survey methods is best for the community, considering the number of people available to assist, the size of the sample needed, and the means available for identifying households to interview.

A. **A telephone survey** is relatively easy to conduct. The interviewer places a telephone call to a previously determined household, introduces himself, identifies the head of the household or a knowledgeable person, proceeds with the interview, and accurately records the answers. However, the steps that must be taken before making telephone calls may prove difficult. In a telephone survey, the telephone numbers of all the households in the service area must be obtained, and a method for contacting households without telephones or those with unlisted numbers must be devised. A reverse directory, listing telephone numbers by addresses, is helpful especially if a sample of the total population is used or survey boundaries are defined.

B. **A door-to-door survey** takes more time to conduct because of the "leg work" needed to obtain interviews. First, the interviewer should introduce himself, then make contact with someone who is qualified to speak for the household (i.e., head of household, spouse of the head of household, or someone in the household who is mature and knowledgeable about household income.) Next, the interviewer identifies the purpose of the survey, solicits participation from the respondent, and accurately records the answers.

Small communities often use a door-to-door survey because the service area is easily defined. By developing procedures for sampling within the service area, a list of all households within the service area is not needed beforehand.

C. **A mail survey** may be the easiest to conduct, but often yields a low rate of response, which means a low degree of accuracy. To conduct a mail survey, the community needs a list of all the addresses in the service area; a questionnaire; stamped, self-addressed return envelope; and postage. Also, provisions must be made to provide non English-speaking residents with a questionnaire in their own language. Consideration must be given to multiple unit residences, such as apartment buildings, which may have only one billing address but represent several households to be surveyed. With mail surveys, at least one follow-up letter or telephone call may be needed to produce the required number of responses.

D. **A combination survey** may be advisable in some situations. For example, when no one is home to answer a door-to-door survey, a note may be left requesting that the occupants telephone the interviewer. Similarly, the interviewer may telephone a household to schedule an interview time. A letter may be mailed to residents of the target area informing them of the date a survey will occur and a time an interviewer(s) will be in the area.

Step Five: Develop Survey Questionnaire

Consistent and accurate responses are more likely to be obtained when questionnaires include a standard introduction explaining the purpose of the survey and ensuring that the respondents' answers will be kept confidential. A procedure to maintain this confidentiality needs to be established. If the respondent's name, address, and telephone number appear only on a cover sheet, it can be thrown away or separated from the questionnaire after the survey is completed. If both the cover sheets and the questionnaires are numbered, they can be matched up if absolutely necessary. What is important is that people will not be able to pick up a questionnaire and see what the Jones family income is.

The same set of questions must be asked in each interview. Questionnaires that contain clearly written questions are more likely to elicit consistent and accurate responses. An additional factor to consider when designing a questionnaire is they cannot be biased or structured to favor one response over another. For example, the questions must not imply that the neighborhood will benefit or receive federal funding if respondents say they have low incomes. However, it is permissible to disclose that the survey is being conducted to gather essential information to support an application for funding under the CDBG Program.

Ideally, questions to determine household income levels and questions related to community development plan priorities are combined into the same survey instrument. Of course, a questionnaire may be designed to ask <u>only</u> the critical questions about income, or <u>only</u> questions about needs. The questionnaire should be long enough to gather needed information, yet brief enough to hold the respondent's attention.

Jurisdictions seeking funds from U.S. Rural Development (RD) sometimes conduct surveys to determine the median income level. One survey can be conducted to meet both CDBG and RD requirements by simply asking for the <u>actual</u> household income and the number of persons in the household. The sample in Attachment 3 can be easily modified to reflect this change.
It is advised to test a draft questionnaire to identify questions that are unclear.

A. Income Questions - The purpose of income questions is to determine whether the household being surveyed has an income above or below the LMI limit. Therefore, income questions must provide accurate information for both household size and household income.

Since questions about income are personal, people are often reluctant to answer them. This is especially true if the reason for the question is not understood. One way to handle this problem is to structure the interview process to first explain why income information is needed, and then to ask the two essential income questions: 1) How many people live in your home? and 2) What is the total income of all members of your household?

When conducting a telephone survey, the interviewer should refer to the Income Limits, ask the size of the household, than ask, "During the past 12 months, was the total income of your household less than or more than (the income amount listed for a family of that size)?"

When conducting a door-to-door survey, the interviewer should carry a set of income cards. Each card should have the income limit for each size of household. (See Table C for an illustration of how to design income cards.) The interviewer finds the appropriate card for the household, hands it to the respondent, and asks "Would you tell me whether, during the past twelve months, the total income of <u>all</u> members of your household was above or below the figure noted on this card?"

TABLE C
Illustration of Income Cards

Card Number	Persons in Household	Income Level
1	1	$27,250
2	2	$31,150
3	3	$35,050
4	4	$38,950
5	5	$42,100
6	6	$45,200
7	7	$48,300
8	8	$51,450

When conducting a mail survey, a clearly written, unbiased questionnaire that includes the two questions about income and household size should be developed. (See Attachment 3, Sample CDBG Income and Community Needs Questionnaire, page 124.)

B. Questions On Community Need and Other Data

The community needs survey is a tool which communities may use when designing a citizen participation process to identify perceived priority needs of the general community and needs of LMI persons.

Additionally, questions concerning needs allow representatives of a local unit of government to compare their own priorities with those of the community's residents. Differences in priorities may signify a need for educating the community or for redefining community priorities. For example, a community may have a severe problem with the sewage system, but the survey response indicates the community development priority of the general population, including LMI persons, is a park. In this case local government officials and staff may need to educate the community about the sewage system need, so a project agreement can be reached.

Needs questions may be developed in many different ways. Two common formats are described below:

1) Develop a list of potential community development needs and ask the respondent to rank them in priority order.

2) Ask the respondent to prioritize three or four needed community projects that should be addressed if funds were to become available.

While there is no “right” or “wrong” format, it should fit the type of survey that will be conducted. Do not, for example, ask a respondent to prioritize a long list of possible community development needs during a door-to-door survey. This may be too time-consuming and confusing. A shorter and less confusing approach when conducting a door-to-door survey might be to ask open-ended questions (Format 2) concerning community development needs.

No matter how questions concerning need are formatted, special care should be taken to ensure that the questions are not “loaded” or biased so that respondents will answer in a particular way. If a list will be used, it should include the same number of possible responses in all categories. While examples are valuable for clarification, they might encourage the respondent to target a particular need they might not previously have considered.

Step Six: Publicize Survey Process

Citizen participation may be promoted by arranging advanced notice. Respondents who know how, when, and why they will be contacted are more likely to complete a questionnaire or an interview. Local newspaper notices, announcements at churches or civic organizations, flyers and radio are means to get information to the public.

As with all aspects of the survey and questionnaire, any publicity must say that the community is applying for a CDBG grant and that, as part of the application, the community has to provide HUD and the state with current estimates of the income of the residents of the service area. It is not appropriate to say that, in order for the community to receive the desired funding, a survey must be conducted to show that most of the residents of the service area have low incomes.

Step Seven: Recruit And Train Survey Staff

A. Recruit staff

It is not necessary to go to great expense to hire professional interviewers. Persons from local community groups may volunteer, or colleges that offer courses on civics, public policy, or survey research may be willing to assist as a means of providing their students with practical experience and credit.

It is best to choose interviewers who can make respondents feel comfortable. For this reason, survey research companies often employ mature women as their interviewers. Also, when interviewers are of the same race and social class as the respondent, the survey generates a better response rate and more accurate results. Most important, however, is to select interviewers who will hold the attention of the respondent, ask the questions as they are written, follow respondent selection procedures, and accurately record the responses.

B. **Train staff**

Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an unresponsive answer, the interviewer should repeat the question exactly as written. Questions should be read in the order in which they are written. The respondent's answers should be recorded neatly and accurately as they are provided. Before proceeding to the next interview, the interviewer should edit the questionnaire to be sure that every answer is clear and accurately recorded. This simple check helps to avoid the need to re-contact the respondent for clarification.

For questions concerning income, note that there may be an important exception to reading the questions in the exact order every time. If questions pertaining to issues other than income are included, and questions on income are placed at the end of the survey, a respondent could end the interview before the critical income question is asked. If it appears to the interviewer that the respondent is about to terminate the interview, it is recommended that he or she immediately try to get an answer to the critical income question.

Step Eight: Conduct Interviews

Interviewers should attempt to contact respondents at a time when they are most likely to get a high rate of response. Telephone interviews are conducted early in the evening when most people are home. Door-to-door interviews also may be conducted early in the evening or on weekends. Attempts should be made at different times to reach anyone in the original sample who is missed by the initial round of interviews.

The interviewer should avoid selecting a time or method that will yield biased results. For example, interviewing only during the day from Monday to Friday probably will miss families where both the husband and wife work. Since these families could have higher incomes than families with only one employed member, poor timing may lead to the biased result of finding an excessively high proportion of low-income households.

Remember, interviewers also should follow the set procedures for replacing unreachables and non-respondents as discussed above in Step 3.

Step Nine: Edit Questionnaires

Interviewers should return completed surveys in to the survey coordinator. The coordinator should ensure that each survey is complete and that each question is answered clearly. Questions or errors that are found should be referred to the interviewer for clarification. Incomplete or ambiguous responses can be clarified by re-contacting the respondent. Note that editing is an ongoing process. Even after data tabulation or analysis has been started, errors may emerge in the data that need to be corrected.

Step Ten: Tabulate Survey Results

Organize and record survey data on a spreadsheet. Use the data on the spreadsheet to complete the Income Survey Worksheet, page 67.

Using spreadsheet software for tabulation may be desirable because the data can easily be checked for accuracy and consistency. However, the calculations can be made by hand or by using a calculator.

Step Eleven: Analyze Survey Results

Because the survey and subsequent tabulations result in estimates, surveyors should carefully analyze the percent of LMI households to obtain the most accurate estimates. If, after using the steps outlined above, results indicate that 55 percent or more of the households of the service area have low- and moderate-incomes, it is reasonable to assume that at least 51 percent of the residents actually have these lower incomes.

However, if the survey results and tabulation indicate that less than 51 percent of the service area households have low- and moderate-incomes, the area is presumed to be ineligible. An application for an area benefit project that <u>does not</u> benefit a minimum of 51 percent of LMI persons <u>will not</u> pass threshold review and be considered for CDBG funding.

If the survey results and tabulation indicate that between 51 and 54 percent of the service area residents have low- and moderate-incomes, it is likely that a majority of all neighborhood residents have lower incomes. Additional analysis will help determine the extent to which the estimated percentage of LMI households is correct. There are two calculations available to determine the accuracy of the estimated LMI percentage of the survey:

A. Compare the average size of LMI households in the sample with the average size of those households with incomes above the LMI limits. The closer these figures are to each other, the more accurate the estimated low-income percentage is assumed to be. For example, <u>if</u> the survey indicates that 53 percent of the households are LMI, and <u>if</u> both below LMI households and above LMI households have an average of 3.4 persons, the surveyors can assume the 53 LMI percentage is valid.

B. The second calculation is to compare the distribution of sizes of households below LMI with sizes of households above LMI. Use Table D to help determine this comparison.

   1. Count the number of one-person LMI households. Enter this figure in Column A across from number one. Next, count the number of two-person LMI households. Enter this figure in Column A across from number two. Continue this process through the “nine or more” category.

   2. Total Column A.

   3. Divide the number of one-person households by the total number of LMI households (total of Column A). Multiply by 100 to yield the percentage of one-person LMI households. Enter this percentage in Column B across from number one. Continue this process through the “nine or more” category. This percentage column should total 100 percent.

4. Follow steps 1 through 3 for above LMI households entering the figures in Columns C and D.

5. Compare the percentages in Column B of LMI households with the percentages in Column D of above LMI households for each of the nine household-size categories. The closer the distribution, the more accurate the estimated LMI percentage from the survey is assumed to be. For example, if among the LMI group, 10 percent have one person, 40 percent have two persons, and 50 percent have three persons, and among the above LMI group 12 percent have one person, 41 percent have two persons, and 47 percent have three persons, a great deal of confidence can be claimed in the estimate.

TABLE D

Table For Comparing The Distribution of
Household Size by Household Income

Number of Persons in the Household	Households with Low- and Moderate-Incomes		Households above Low- and Moderate-Incomes	
	Column A	Column B	Column C	Column D
	Number	Percent	Number	Percent
One	_____	_____%	_____	_____%
Two	_____	_____%	_____	_____%
Three	_____	_____%	_____	_____%
Four	_____	_____%	_____	_____%
Five	_____	_____%	_____	_____%
Six	_____	_____%	_____	_____%
Seven	_____	_____%	_____	_____%
Eight	_____	_____%	_____	_____%
Nine or more	_____	_____%	_____	_____%
Totals	_____	_____%	_____	_____%

The statistical validity of the survey is increased by locating patterns of the unreachables and non-respondents, or by detecting major gaps in the sample coverage. Analyze the unreachables and non-respondents to verify that they are reasonably random by tabulating the rate of response by street or block in the service area to determine if there are notable gaps in the survey coverage. Next, examine the racial or ethnic population of respondents and compare it with the distribution ratios of the universe or service area. If the ratios are close, the surveyors are assured that the random sample was a good representation of the racial and ethnic population of the service area.

Step Twelve: Retain Documentation Of Survey Process And Results

Maintain survey documentation consisting of completed questionnaires, a list of respondents, a description of the sampling procedures, and survey tabulations.

A. Retain completed surveys. These serve as documentation that the survey was conducted, the proper questions asked, and that the sample was adequate.

To maintain confidentiality, save the cover sheets separately from the survey questions. If necessary, they can be matched later for verification.

B. Retain a list of households of the original sample and a list of households actually interviewed. Compile a list of households that were in the original sample and those households that were actually interviewed. The process used to replace unreachable or other non-respondent households should also be noted.

C. Retain sampling procedures. Written documentation should describe the method used to select sample households.

D. Retain data. Data may be retained by disk/CD, spreadsheet, or table.

Discussion Of Sample Sizes

Samples of the sizes suggested in Table A of this section are intended to provide an estimate of the proportion of households that say they have low- and moderate-incomes that will be within + or -5 percent of the proportion that all households in the area would indicate if all were interviewed. Thus, 200 randomly selected households were interviewed from a 350 household neighborhood and 70 percent indicated that they have low- and moderate-incomes, it can be reasonably inferred that if all 350 households were interviewed, between 65 and 75 percent of the households would say that they had low- and moderate-incomes.

In the survey being discussed in this section, the confidence interval probably will be a little less than + or -5 percent. The method here is to estimate the proportion of <u>people</u> who are income-eligible, not the proportion of <u>households</u>. Following the procedures outlined here will result in sampling a fraction of people that is approximately equal to the fraction of households that would be sampled by following Table A (number of people sampled/total number of people = number of households sampled/total number of households). Other things being equal, if the size of the universe is increased and the same sampling fraction is maintained, the confidence interval decreases.

Of course, in this application, other things may not be equal. By sampling households as a cluster for gathering data on individuals, we are departing from a purely random selection of individuals. Thus, the actual confidence can be calculated only after the data actually are collected and the variance on household size and income are analyzed. The actual confidence interval should be a little less than + or -5 percent. But we also included an "analysis" section in the paper to help in determining the extent to which it may be less than + or -5 percent.

Instructions For Using
A Random Numbers Table

This attachment contains a two-page table of random numbers. It is just that--each number there is random. It can be used going up, down, sideways, or diagonally, and any column or combination of columns can be used in drawing random numbers. The following are some examples of how the table can be used.

Example 1: Drawing a Sample of 5 of 10

Assume there is a universe listing of 10 households and an interviewer wants to draw a random sample of 5 households. Look on the Random Numbers Table, Attachment 2, page 122. Find the number "53" in the upper left hand corner. Let's start with the "5" and work down the column: the numbers we find are "5, 6, 9, 1, and 3." So from the list of 10 households, our sample would include the 5th, 6th, 9th, 1st, and 3rd households on the list.

Example 2: Drawing a Sample of 5 of 100

Start this time with the "31" in the lower left hand corner of the table. Let's work across the bottom row from here, and take the numbers "31, 6, 46, 39, and 27." From the list of 100 households, our sample would include the 31st, 6th, 46th, 39th, and 27th households on the list.

Example 3: Drawing a Sample of 5 of 30

Start this time back in the upper left hand corner and start with the "53" and work across. The numbers in order are "53, 95, 67, 80, 79, 94, 28, 69, and 25." Notice that all of these numbers, except for the 25 and 28, are greater than 30. Just skip them until a number is found in the correct range. Here, sample the 28th and 25th household on your list and continue until three more (which would be the 13th, the 24th, and the 21st) are found.

Example 4: Drawing a Sample of 5 of 300

Start again with the "53" in the upper left hand corner. Well, actually let's move over one column and start with the "3 95." Since we need a three-digit number to cover the size of our universe list, we can use these three (or any three columns--each number is random.) Reading down from the "3 95," we see "3 95, 2 12, 0 16, and 0 59." From the list of 300 households, then, take the 212th, the 16th, and the 59th households (as well as how many more you needed - the next two would be the 217th and the 60th.)

Random Numbers Table

1	53	95	67	80	79	94	28	69	25	78	13	24	100	62	62	21	1	44	59	90	74	63	4	97
2	62	12	27	41	5	4	19	34	84	78	71	45	73	79	33	57	2	20	79	78	68	31	25	30
3	90	16	47	72	70	2	67	21	65	7	39	58	81	6	4	79	44	47	7	74	34	55	28	90
4	10	59	4	76	80	86	82	20	60	92	33	61	76	83	73	12	8	71	82	28	21	61	31	92
5	32	17	36	64	8	30	80	95	61	33	65	5	39	88	36	44	4	86	61	13	63	15	47	92
6	54	71	27	69	41	53	60	10	2	91	76	95	98	91	64	65	2	0	90	52	26	90	49	31
7	10	60	18	77	34	59	28	99	15	11	70	34	27	78	67	19	9	60	0	22	11	12	54	50
8	42	20	24	36	78	58	82	81	45	91	35	53	30	92	57	19	9	13	39	42	25	3	97	64
9	73	55	87	48	49	97	60	92	27	78	2	55	29	76	99	21	45	24	16	33	50	84	12	65
10	21	56	41	23	58	57	49	49	70	33	6	79	95	3	70	38	26	89	49	0	68	57	53	91
11	9	60	37	99	6	41	69	97	18	44	100	18	46	3	90	57	22	35	73	97	74	9	35	82
12	63	26	41	8	21	38	15	63	38	100	68	89	24	39	19	29	95	91	70	41	95	83	33	25
13	98	72	9	45	69	50	7	86	5	80	0	8	28	96	45	0	0	26	92	51	11	11	37	91
14	87	88	65	22	98	55	86	9	65	43	64	55	80	30	15	99	26	87	22	39	97	26	50	12
15	5	91	68	44	67	2	71	96	13	73	78	3	12	87	53	9	11	32	57	72	16	35	27	51
16	75	93	62	49	95	82	30	81	24	4	11	30	71	96	49	47	65	8	91	58	40	35	32	7
17	76	15	55	38	29	0	8	20	71	42	81	51	44	76	93	42	87	51	88	65	93	80	66	91
18	26	76	93	84	8	40	96	69	84	52	89	5	16	43	34	37	64	77	85	100	52	99	36	81
19	8	35	6	83	76	8	67	81	13	33	14	86	38	25	33	22	56	36	97	89	20	59	52	9
20	59	73	37	6	26	44	0	24	89	24	78	80	20	6	9	31	32	32	32	23	57	74	49	17
21	87	94	75	45	72	15	39	100	46	99	59	12	22	98	76	16	27	41	31	99	27	24	89	16
22	5	74	8	91	37	5	13	55	13	7	19	24	76	4	25	93	75	80	98	71	37	53	57	75
23	49	60	82	39	40	51	15	71	53	65	86	60	93	31	22	64	77	46	25	2	17	69	68	56
24	2	25	92	97	41	39	98	100	99	87	44	0	99	93	31	69	26	25	71	42	26	22	96	76
25	59	41	49	100	13	0	15	33	62	61	25	59	53	8	17	76	24	25	3	2	76	57	10	18
26	40	13	20	51	81	15	12	45	16	57	47	54	92	60	70	86	98	27	95	66	23	91	73	86
27	80	29	91	36	93	59	19	9	47	61	86	89	96	18	11	56	99	67	21	24	80	60	44	42
28	48	33	7	70	61	95	51	32	89	87	72	6	40	88	52	44	19	62	12	100	62	5	17	62
29	89	5	7	93	48	60	69	97	61	21	87	68	20	4	61	63	75	92	37	35	40	70	25	86
30	97	64	36	30	99	98	23	16	66	28	58	45	34	16	64	71	48	57	15	14	24	25	55	29
31	59	73	71	62	66	34	17	41	32	65	50	73	82	7	20	55	1	86	23	19	40	61	48	95
32	68	75	43	66	66	38	50	31	25	36	26	91	36	100	88	42	74	40	33	92	18	9	34	51
33	34	16	43	38	50	28	34	14	41	2	6	97	56	73	75	17	66	83	32	25	33	32	26	75
34	14	61	81	2	6	973	3	89	79	64	67	80	75	5	66	77	97	82	52	87	25	63	11	67
35	15	39	5	99	29	36	25	40	45	28	34	63	75	18	21	23	13	14	66	70	92	44	23	73
36	68	49	1	55	11	6	63	23	50	33	60	34	82	20	66	48	27	75	74	69	9	23	66	62
37	1	72	18	84	84	66	61	41	22	61	45	36	37	16	20	26	96	39	67	100	71	8	19	29
38	58	73	55	11	9	96	81	84	21	34	50	92	65	91	69	33	23	93	3	37	95	14	84	27
39	91	63	65	63	70	90	57	20	9	13	25	77	72	0	12	30	45	89	94	6	58	72	73	16
40	39	45	31	74	91	85	29	45	98	15	11	60	26	16	36	76	1	85	15	50	27	55	0	86

Random Numbers Table (continued)

41	94	12	62	59	14	42	32	75	41	41	0	55	5	76	89	46	35	70	20	98	36	93	67	35
42	3	33	41	22	45	37	65	3	96	27	62	77	16	97	81	75	26	89	77	82	54	1	63	24
43	58	2	83	10	50	98	32	65	31	67	84	45	0	90	42	17	21	92	92	47	5	29	6	52
44	29	73	79	48	66	72	32	1	100	3	2	61	35	0	88	100	45	16	48	67	36	37	57	12
45	55	9	63	66	31	5	8	72	4	85	5	44	4	98	2	79	40	75	91	59	66	15	41	19
46	52	13	44	91	39	85	22	33	4	29	52	6	82	77	25	0	4	61	35	45	93	11	9	52
47	31	52	65	63	88	78	21	35	28	22	91	84	4	30	14	0	97	87	46	73	55	62	18	76
48	44	38	76	99	38	67	60	95	67	68	17	18	46	76	83	5	8	87	2	42	65	27	16	22
49	84	47	44	4	67	22	89	78	44	64	66	15	56	0	90	21	25	100	32	66	3	50	92	46
50	71	50	78	48	65	74	21	24	2	23	65	94	51	82	67	16	35	35	61	31	75	8	91	58
51	42	47	81	10	99	40	15	63	77	69	10	32	92	86	32	9	69	50	78	61	78	15	16	79
52	3	70	75	49	90	92	62	0	47	90	78	63	44	60	13	55	28	63	92	17	100	2	40	93
53	31	6	46	39	27	93	81	79	100	94	43	39	79	2	18	82	40	31	81	84	62	41	59	4

Attachment 3

Sample CDBG Income and Community Needs Questionnaire

(Use the Income Limits contained in the most recent CDBG General Purpose Application Handbook to enter the income in the last column of 1.)

1. Please circle the number of people living in your household and, following the same line across, mark if your total household income is “above” or “below” the corresponding income figures.

1 person:	income is	☐	above or	☐	below annual income		$_____
2 persons:	income is	☐	above or	☐	below annual income		$_____
3 persons:	income is	☐	above or	☐	below annual income		$_____
4 persons:	income is	☐	above or	☐	below annual income		$_____
5 persons:	income is	☐	above or	☐	below annual income		$_____
6 persons:	income is	☐	above or	☐	below annual income		$_____
7 persons:	income is	☐	above or	☐	below annual income		$_____
8 persons:	income is	☐	above or	☐	below annual income		$_____

2. We are interested in finding out what you think are the priority needs in your community. We would like for you to rate the following (#1 being the highest, and #10 being the lowest) in the following listing:

☐ Sewer System	☐ Water System Improvements
☐ Housing Rehab. Projects	☐ Increased Fire Protection
☐ Park and Rec., School	☐ Community Center
☐ Senior Center	☐ Day Care
☐ Streets and Sidewalks	☐ Other (please list):

3. ☐ I am 62+ years of age ☐ I am less than 62 years of age

4. PRESENT EMPLOYMENT STATUS:

☐ Employed	☐ Part-time Employment
☐ Unemployed	☐ Retired

Comments:

(Note: This survey format can be modified to meet both CDBG and USDA-RD requirements by simply asking for the actual household income and the number of persons in the household.)

Instructions For Completing The Income Survey Worksheet

The Income Survey Worksheet is used to summarize the results of an income survey, establishing a percentage of LMI persons in the service area of the proposed project. Most questions are self-explanatory. Make sure answers are logical. For example, the number on Line 4 cannot be smaller than the number on Line 3 (because every household must have at least one person). Similarly, the number on Line 6 cannot be less than the number on Line 5. Also note that the number on Line 3 plus the number on Line 5 should equal the number on Line 2--every household is either LMI or it is not.

Line 1. Enter the most current estimate of the total number of households in the service area.

Line 2. For the number of households interviewed, enter the total number of interviews with complete and accurate responses to the income and size of household questions.

Line 3. Based on income and household size information contained in the survey, determine the number of LMI households interviewed.

Line 4. Enter the total number of persons living in all households that were determined to be LMI.

Line 5. Based on the income and household size information, determine the total number of households interviewed in which income was above the LMI level.

Line 6. Enter the total number of persons living in all households that were determined to be above the LMI level.

For purposes of illustration, assume the service area is estimated to contain 650 households (Line 1). Assume 250 households (Line 2) were interviewed and 130 had low- and moderate-incomes (Line 3). These LMI households contained 450 persons (Line 4). The 120 households with incomes above the LMI level (Line 5) contained 400 persons (Line 6). Complete Lines 7 through 16 as follows:

Line 7. If the households interviewed contained 450 LMI persons in 130 households, the number on Line 7 would be 3.46 (450/130).

Line 8. If the households interviewed contained 400 non-LMI persons in 120 households, the number on Line 8 would be 3.33 (400/120).

Line 9. If a total of 250 households were interviewed, 130 of which had low- and moderate-incomes, the number on Line 9 would be .52 (130/250).

Instructions For Completing The Income Survey Worksheet

Line 10. If 120 of the 250 households interviewed did not have low- and moderate-incomes, the number on Line 10 would be .48 (120/250).

Line 11. If the service area contained an estimated 650 households, and 250 interviewed, of which 130 had low- and moderate-incomes, the number on Line 11 would be 338 (650 X .52).

Line 12. Continuing with the example, Line 12 would be 312 (650 X .48).

Line 13. 3.46 persons per LMI household times 338 LMI households--Line 13 would be 1,169.

Line 14. 3.33 persons per non-LMI household times 312 non-LMI households--Line 14 would be 1,039.

Line 15. Total LMI persons (1,169) plus total non-LMI persons (1,039)--Line 15 would be 2,208 estimated total persons.

Line 16. 1,169 LMI persons divided by 2,208 total persons yields about .5294. Multiplied by 100, this gives an estimate that 52.94 percent of the residents have low- and moderate-incomes.

Attachment 4

Income Survey Worksheet

1. Enter the estimated total number of households in the service area. ________

2. Enter the total number of households interviewed. ________

3. Enter the total number of LMI households interviewed. ________

4. Enter the total number of persons living in the LMI households interviewed. ________

5. Enter the total number of households interviewed in which the income was above the LMI level. ________

6. Enter the total number of persons living in the households interviewed in which the income was above the LMI level. ________

7. Divide Line 4 by Line 3. (This is the average size of the LMI household interviewed.) ________

8. Divide Line 6 by Line 5. (This is the average size of the non-LMI household interviewed.) ________

9. Divide Line 3 by Line 2. (This is the percentage of households interviewed that have low- and moderate-incomes.) ________

10. Divide Line 5 by Line 2. (This is the percentage of households interviewed that do not have low- and moderate-incomes.) ________

11. Multiply Line 1 by Line 9. (This is the estimate of the total number of LMI households in the service area.) ________

12. Multiply Line 1 by Line 10. (This is the estimate of the total number of non-LMI households in the service area.) ________

13. Multiply Line 7 by Line 11. (This is the estimate of the total number of LMI persons in the service area.) ________

14. Multiply Line 8 by Line 12. (This is the estimate of the total number of non-LMI persons in the service area.) ________

15. Add Line 13 and Line 14. (This is the estimate of the total number of persons in the service area.) ________

16. Divide Line 13 by Line 15, and multiply the resulting decimal by 100. (This is the approximate percentage of persons in the service area who have low- and moderate-incomes. ________

FEDERAL AND STATE REGULATIONS

Jurisdictions receiving CDBG funds must follow a number of federal and state regulations. These laws cover a wide range of activities, such as labor practices, environmental impacts, and civil rights. Listed below are some of the most important regulations that could apply to projects involving CDBG funds. This is a preliminary list and by the time funds are released, it could change, depending upon actions at the federal level. Each regulation is annotated to give the applicant some idea of the requirements that must be met. Since this is only a summary and is not meant to be a comprehensive description of each law, please contact the Department of Community, Trade and Economic Development if you need more detailed information.

Federal Regulations

<u>Public Law 88-352, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) (24 CFR Part 1)</u>

The law provides that no person in the United States shall, on the grounds of race, color, or national origin, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity receiving federal financial assistance.

<u>Public Law 90-284, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.)</u>

The law prohibits any person from discriminating in the sale or rental of housing, the financing of housing or the provisions of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, handicap, familial status, or national origin.

<u>Executive Order 11063, As Amended by Executive Order 12259 (24 CFR Part 107)</u>

Necessary and appropriate action must be taken to prevent discrimination because of race, color, religion, creed, sex or national origin; in the sale, leasing, rental and other disposition of residential property and related facilities (including land to be developed for residential use); or in the use or occupancy thereof if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants or contributions from the federal government.

<u>Section 104(b)4 of the Housing and Community Development Act of 1974, As Amended</u>

The Grantee must comply with the provisions of Section 104(b)4 of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee will identify its community development and housing needs, including the needs of low-income persons and the activities to be undertaken to meet such needs.

Section 104(1) of the Housing and Community Development Act of 1974, As Amended through 1992. Protection of Individuals Engaged in Nonviolent Civil Rights Demonstration

The grantee must comply with the provisions of Section 104(1) of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee must adopt and enforce a policy of prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and it must adopt and enforce a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction.

Section 109 of the Housing and Community Development Act of 1974, As Amended through 1992

No person in the United States shall, on the grounds of race, religion, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with federal community development funds made available pursuant to Title I of the Act.

Age Discrimination Act of 1975, As Amended (42 U.S.C. 6101 et seq.)

No person shall be excluded from participation, denied program benefits, or subjected to discrimination on the basis of age under any program or activity receiving federal funding assistance.

Section 504 of the Rehabilitation Act of 1973, As Amended (29 U.S.C. 794)

No otherwise qualified individual shall, solely, by reason of his or her handicap, be excluded from participation (including employment), denied program benefits or subjected to discrimination under any program or activity receiving federal assistance funds.

Section 3 of the Housing and Community Development Act of 1968 (12 U.S.C. 170 u) (24 CFR Part 135)

To the greatest extent feasible, opportunities for training and employment should be given to lower income persons residing within the unit of local government or the non-metropolitan county in which the project is located, and contracts for work in connection with the project should be awarded to eligible business concerns which are located in, or owned in substantial part, by persons residing in the project area.

Executive Order 11246, As Amended

Executive Order 11246 as amended applies to all federally assisted construction contracts and subcontracts. The grantee and subcontractors, if any, shall take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex or national origin. The grantee or subcontractors will make their books and records available to state and federal officials for purposes of investigation to ascertain compliance.

Section 110 of the Housing and Community Development Act of 1974, As Amended through 1992

All laborers and mechanics employed by contractors or subcontractors on construction work assisted under the Act shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276-a- 276a-5). However, these requirements apply to rehabilitation of residential property only if such property is designed for residential use for eight or more families.

Davis-Bacon Act, As Amended (40 U.S.C. a - et seq.), Section 2; June 13, 1934, As Amended (48 Stat. 948.40 U.S.C. 276(c), Popularly Known as The Copeland Act

This Act mandates that all laborers and mechanics be paid unconditionally and not less often than once a week, and without subsequent deduction or rebate on any account except "permissible" salary deductions, the full amounts due at the time of payments, computed at wage rates not less than those contained in the wage determination issued by the U.S. Department of Labor. Weekly certified payrolls are required to be submitted to the federally-funded recipient by the contractor.

Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.)

According to this Act, no contract work may involve or require laborers or mechanics to work in excess of 40 hours in a work week, unless compensation of not less than one and one-half times the basic rate is paid for the overtime hours. If this Act is violated, the contractor or subcontractor is liable to any affected employee for unpaid wages as well as to the United States for liquidated damages.

Section 104(g) of the Housing and Community Development Act of 1974, As Amended through 1992

Recipients of community development funds made available pursuant to Title 1 of the Act assumes all the responsibilities for environmental review, decision-making, and action pursuant to the National Environmental Policy Act of 1969, that would apply to the Secretary of HUD were he to undertake such projects as federal projects.

The National Environmental Policy Act of 1969 (42 U.S.C. Section 4321, et seq. and 24 CFR Part 58)

The purpose of this Act is to attain the widest use of the environment without degradation, risk to health or safety or other undesirable and unintended consequences. Environmental review procedures, including completing a checklist and determining and publishing a Finding of Significance or No Significance for a proposal, are a necessary part of this process. Pursuant to these provisions, the grantee must also submit environmental certifications to the Agency when requesting that funds be released for the project.

The Clean Air Act, As Amended (42 U.S.C. 7401, et seq.)

The Clean Air Act prohibits (1) engaging in, (2) supporting in any way or providing financial assistance for, (3) licensing or permitting or (4) approving any activity which does not conform to the state implementation plan for natural primary and secondary ambient air quality standards.

HUD Environmental Standards (24 CFR, Part 51, Environmental Criteria and Standards and 44 F.R. 40860-40866, July 12, 1979)

The HUD Environmental Standards prohibit HUD support for most new construction of noise-sensitive uses on sites having unacceptable noise exposure. HUD assistance for the construction of new noise-sensitive uses is prohibited in general for projects with unacceptable noise exposures and is discouraged for projects with normally unacceptable noise exposure.

Executive Order 11990, May 24, 1977: Protection of Wetlands (42 F.R. 26961, et seq.)

The intent of this Executive Order is (1) to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands; and (2) to avoid direct or indirect support of new construction in wetlands wherever there is a practical alternative. In making this determination, the grantee may take into account economic, environmental, and other pertinent factors.

The Wild and Scenic Rivers Act of 1968, As Amended (16 U.S.C. 1271, et seq.)

The purpose of this Act is to preserve selected rivers or sections of rivers in their free-flowing condition, to protect the water quality of such rivers, and to fulfill other vital national conservation goals. Federal assistance by loan, grant, or other mechanism cannot be provided to water resources construction projects that would have a direct and adverse effect on any river included or designed for study or inclusion in the National Wild and Scenic River System.

Executive Order 11988, May 1978: Floodplain Management (42 F.R. 26951, et seq.)

The intent of this Executive Order is to (1) avoid, to the extent possible, adverse impacts associated with the occupancy and modification of floodplains and (2) avoid direct or indirect support of floodplain development wherever there is a practical alternative. If the grantee proposes to conduct, support or allow an action to be located in the floodplain, the grantee must consider alternatives to avoid adverse effects and incompatible involvement in the floodplains. If siting in a floodplain is the only practical alternative, the grantee must, prior to taking any action: (1) design or modify its actions in order to minimize a potential harm to the floodplains; and (2) prepare and circulate a notice containing an explanation of why the action is proposed to be located in a floodplain.

Coastal Zone Management Act of 1972, As Amended (16 U.S.C. 1451, et seq.)

The intent of this is to preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone. Federal agencies cannot approve assistance for proposed projects that are inconsistent with the state's coastal management program, except upon a finding by the U.S. Secretary of Commerce that such a project is consistent with the purpose of this chapter or necessary in the interests of national security.

The Endangered Species Act of 1973, As Amended (16 U.S.C. 1531, et seq.)

The intent of this act is to ensure that all federally assisted projects seek to preserve endangered or threatened species. Projects must not jeopardize the continued existence of endangered and threatened species or result in the destruction of or modification of habitat of such species, which is determined by the U.S. Department of the Interior, after consultation with the state, to be critical.

The Reservoir Salvage Act of 1960 (16 U.S.C. 469 et seq.), Section 3 (16 U.S.C. 469 a-1), As Amended by the Archaeological and Historic Preservation Act of 1974)

The Reservoir Salvage Act provides for the preservation of historical and archaeological data (including relics and specimens) that might otherwise be irreparably lost or destroyed as a result of any alteration of the terrain caused by any federal construction project or federally-licensed activity or program. Whenever any federal agency finds, or is notified in writing by an appropriate historical or archaeological authority, that its activities in connection with any federal construction project or federally-licensed project, activity or program may cause irreparable loss or destruction of significant scientific, prehistoric, historical or archaeological data, the federal agency must notify the U.S. Secretary of Interior in writing and provide appropriate information concerning the project, program or activity.

The Safe Drinking Water Act of 1974 (42 U.S.C. Section 201, 300(f) et seq. and U.S.C. Section 349 as amended, particularly Section 1424(e) (42 U.S.C. Section 300H-303(e))

The Safe Drinking Water Act, as amended, is intended to protect underground sources of water. No commitment for federal financial assistance, according to this Act, shall be entered into for any project which the U.S. Environmental Protection Agency determines may contaminate an aquifer which is the sole or principal drinking water source for an area.

The Federal Water Pollution Control Act of 1972, As Amended including the Clean Water Act of 1977, Public Law 92-212 (33 U.S.C. Section 1251, et seq.)

The Water Pollution Control Act, as amended, provides for the restoration of chemical, physical and biological integrity of the nation's water.

The Solid Waste Disposal Act, As Amended by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. Section 6901, et seq.)

The purpose of this Act is to promote the protection of health and the environment and to conserve valuable material and energy resources.

The Fish and Wildlife Coordination Act of 1958, As Amended (16 U.S.C. Section 661, et seq.)

The Act assures that wildlife conservation receives equal consideration and is coordinated with other features of water resource development programs.

EPA List of Violating Facilities

Grantees must ensure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the program are not listed on the U.S. Environmental Protection Agency's list of Violating Facilities and that it will notify the Agency of the receipt of any communication from the Director of the EPA office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by EPA.

Executive Order 11593, and the Preservation of Archaeological and Historical Data Act of 1966 (16 U.S.C. 469 a-1, et seq.)

Grantees must, in connection with its performance of environmental assessments under the NEPA take the following steps:

1. Consult with the State Historical Preservation Officer to identify properties listed in or eligible for inclusion in the National Register of Historic Places that are subject to adverse effects (see 36 CFR Part 800.0) by the proposed activity; and

2. Comply with all requirements established by the state to avoid or mitigate adverse effects upon such properties.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4630) as Amended in 1989

Grantees must inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations of 49 CFR Part 24 and 24 CFR 570.496(a).

The grantee must also certify that it is following a "residential anti-displacement and relocation assistance plan." The plan must contain two components -- a requirement to replace all low income dwelling units that are demolished or converted to a use other than low income housing as a direct result of the use of CDBG assistance and a relocation assistance component.

The grantee must provide relocation payments and offer relocation assistance as described in the Act to all persons displaced as a result of rehabilitation, demolition, or acquisition of real property for an activity assisted under the Community Development Block Grant Program. Such payments and assistance must be provided in a fair and consistent and equitable manner that ensures that the relocation process does not result in a different or separate treatment of such persons on account of race, color, religion, national origin, familial status, handicap, sex or source of income.

The grantee must assure that, within a reasonable period of time prior to displacement, decent, safe, and sanitary replacement dwellings will be available to all displaced families, individuals, businesses, nonprofit organizations, and farms and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, familial status, handicap, sex, or source of income.

Section 104(d) of the Housing and Community Development Act of 1974, As Amended through 1992

Grantees must adopt a residential anti-displacement and relocation assistance plan. The plan must: (1) provide for one-for-one replacement of low income dwelling units demolished or converted to use other than low- to moderate-housing as a direct result of the use of CDBG assistance; (2) provide for relocation assistance; and (3) describe steps to minimize displacement.

Title IV of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831) prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance.

Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments (24 CFR Part 85)

Grantees must comply with the guidelines of Federal Circular A-87, which sets forth principles and standards for determining the costs allowable under grants and contracts involving federal funds.

U.S. Office of Management and Budget Circular A-102, "Uniform Administrative Requirements for Grants-in-Aid to State and Local Governments"

Grantees must comply with OMB Circular A-102 or any equivalent procedures and requirements that the state may prescribe. The Circular is the basis for a number of specific requirements on the financial management and record keeping of CDBG funds. The directive applies to cash depositories, bonding and insurance, record keeping, program income, property management, procurement, close-out, audit, and other requirements. The following Attachments to OMB Circular A-102 do not specifically apply to the grantee's project: "Attachment D - Waiver of Single State Agency Requirements," "Attachment F - Matching Share," and "Attachment M - Standard Forms for Application."

Non-Federal Government Audit Requirements (24 CFR Part 44)

Grantees must comply with the requirements of 24 CFR Part 44, which requires that any Grantee receiving $100,000 in federal funds, during any year, to have an audit performed for that year. Grantees receiving between $25,000 and $100,000 in federal funds, during any year, shall have an audit performed in accordance with generally accepted auditing standards and the following federal auditing standards:

A. Standards for Audit of Governmental Organizations, Programs, Activities, and Functions, issued by the U.S. General Accounting Office (GAO);

B. The Single Audit Act of 1984 (P.L. 98-502); and

C. Circular A-133, Audits of State, Local Governments and Non-Profit Organizations issued by the U.S. Office of Management and Budget (OMB).

State Regulations

Prevailing Wages, RCW 39.12

This statute mandates that prevailing wages, as determined by the State Department of Labor and Industries, be paid to workers performing under public works contracts.

Uniform Relocation Assistance and Real Property Acquisition Policy Act, RCW 8.26

Grantees must comply with the provisions of Chapter 8.26 RCW and WAC 365-24 when its activities involve any acquisition of real property assisted under this contract and or the displacement of any family, individual, business, nonprofit organization or farm that results from such acquisition.

State Environmental Policy Act (SEPA, RCW 43.21(c)

Local agencies will (1) require environmental checklists from private and public entities considering an action potentially subject to an Environmental Impact Statement requirement of SEPA; (2) make "threshold determinations that such an action will not have a significant environmental impact; (3) provide for the preparation of draft and final EIS if the determination under (2) above is yes; and (4) circulate such EIS's to other agencies and interested parties.

Shoreline Management Act, RCW 90.58

This Act defines a planning program and a permit system which are initiated at the local government level under state guidance. Its purpose is to protect and enhance the state's shorelines, and it includes a comprehensive shoreline inventory process and master program for regulation of shoreline uses. A permit application at the local level must be in compliance with those plans if substantial developments and shoreline modifications occur, and a record of the application and decision must be submitted to the state.

State Building Code, RCW 19.27, and Provisions in Buildings for Aged and Handicapped Persons, RCW 70.92

Grantees must comply with the provisions of Chapter 19.27 RCW and Chapter 70.92 RCW and regulations for Barrier Free Facilities adopted by the Washington State Building Code Advisory Council pursuant to these statutes.

The State Building Code provides for a uniform state building code and mandates counties, cities and towns to administer and enforce its provisions. Local governments are authorized to modify the state building code to fit local conditions as long as such modifications do not provide for weaker control than the minimum standards and objectives called for in the state code.

State Noise Control Act of 1979, RCW 70.107

Objectives of this Act are to assist local governments in implementing local noise ordinances and to control and reduce excessive noise in Washington State.

State Open Public Meeting Act, RCW 42.30

All meetings of the governing body which pertain to this contract shall be open to the public except those where specific provision is made for executive sessions pursuant to Section 42.30.110 of the statute.

RCW 49.60 Law Against Discrimination

Grantees must comply with the provisions of Chapter 49.60 RCW in all activities relating to this contract.

RCW 39.39 Interlocal Cooperation Act

The Interlocal Cooperation Act establishes, as state policy, the authority for local governments, including special purpose districts and Indian tribes, to enter into agreements for providing a broad spectrum of cooperative services. Local governments undertaking joint community development projects can use this Act as a means for establishing interlocal agreements.

State Coastal Zone Management Program

Grantees must consult with the State Coastal Zone Management Agency (Department of Ecology) and must certify that the project is consistent with the State Coastal Zone Management Program.

Governor's Executive Order 89-10, December 11, 1989: Protection of Wetlands, and Governor's Executive Order 90-04, April 21, 1990: Protection of Wetlands

Grantees must ensure that any activities that would adversely affect wetlands are avoided and unavoidable impacts are mitigated. For the purposes of this requirement, mitigation means: (1) avoiding the impact altogether by not taking certain action or part of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and (6) monitoring the impact and taking appropriate corrective actions.

Emergency work that is essential to save lives and protect property and public health is exempt from these provisions.

washington state department of community, trade and economic development

Subvención Global Para Desarrollo Comunitario

División de Gobierno Local

Para mas información

Peter McMillin
Director Del Programa CDBG
360.725.3005
Peterm@cted.wa.gov

Dan Riebli
Gerente de Proyecto de CDBG
360.725.3017
Danr@cted.wa.gov

Sheila Lee-Johnston
Gerente de Proyecto de CDBG
360.725.3009
Sheilal@cted.wa.gov

Bill Prentice
Gerente de Proyecto de CDBG
360.725.3015
Billp@cted.wa.gov

Sharon Robinson
Gerente de Proyecto de CDBG
360.725.3010
Sharonr@cted.wa.gov

Kaaren Roe
Gerente de Proyecto de CDBG
360.725.3018
Kaarenr@cted.wa.gov

Leona Moon
Gerente de Proyecto de CDBG
360.725.3022
Leonamo@cted.wa.gov

Introducción:

El programa de Subvención Global para Desarrollo Comunitario del Estado de Washington (CDBG) proporciona fondos sobre una base competitiva para vivienda local, instalaciones públicas y comunitarias, desarrollo económico y proyectos de planificación que benefician principalmente a los hogares de ingresos bajos y moderados.

Los fondos para el programa CDBG del Estado de Washington son despendidos por el Departamento de Viviendas y Desarrolló Urbano de los Estados Unidos. El Programa de Subvención para el Desarrollo Comunitario (CDBG) de estado de Washington esta deseando para financiar hogares locales, albergues públicos, desarrollos económicos y desarrollar proyectos cuyo **propósito** principal es beneficiar a las familias de bajos y moderados recursos económicos. Esto resultar en un benefició para toda la comunidad.

Fondos Disponibles

Históricamente, se han distribuido aproximadamente $15 millones en fondos federales sobre una base anual, a través de los siguientes propuesto fondos de concesión:

- **Concesión de Propósito General** **$7,000,000**
  Contacto: Bill Prentice
  Ciclo de concesión anual durante el cual los solicitantes elegibles pueden pedir hasta $1,000,000 por solicitud para proyectos de vivienda local, instalaciones públicas, instalaciones de la comunidad, o de desarrollo económico/microempresas, principalmente en beneficio de personas de ingresos bajos y moderados. La fecha de vencimiento para el ciclo de concesión de 2006 es el 17 de noviembre de 2005, con anuncio de la decisión en el medio de Marzo 2006.
- **Concesión de Fondos de Inversión de la Comunidad** **$3,356,516**
  Contacto: Dan Riebli
  Proporciona ayuda técnica y financiera a comunidades elegibles de arriba a $1,000,000 por la aplicación a través del año en un fondos la base disponible para la comunidad y proyectos económicos de desarrollo identificó por un proceso local de la priorización. La ayuda se coordina con el Equipo del Recurso del departamento.
- **Concesión para Planificación Solamente** **$ 500,000**
  Contacto: Sheila Lee-Johnston
  Las Concesiones para Planificación Solamente se proporcionan a las comunidades elegibles sobre una base de disponibilidad de fondos, para una gama amplia de actividades de planificación dirigidas hacia la salud pública y asuntos de seguridad; para responder a los mandatos estatales y federales; para mejorar servicios esenciales para individuos de ingresos bajos y moderados; o, para completar los pasos necesarios dentro de una estrategia de desarrollo comunitario más amplia. Se encuentran disponibles concesiones de hasta $35,000. El consorcio de solicitantes elegibles puede solicitar hasta $50,000.

Requisitos de Participación Ciudadana Federal
Para Solicitantes del Gobierno Local al Programa de CDBG

Regulación Federal 24 CFR 570.486(a)

(a) *Requisitos de participación ciudadana de una unidad general del gobierno local.* Cada unidad general del gobierno local, debe cumplir los siguientes requisitos como es solicitado por el estado, en el Sec. 91.115(e) de este artículo.

(1) Contribuir y motivar a la participación ciudadana, particularmente en personas de recursos bajos y moderardos quienes residen en condiciones precarias o áreas insalubres y áreas donde el Programa de CDBG tiene como objetivo apoyar con financiamiento;

(2) Asegurar que los ciudadanos tengan acceso oportuno y suficiente a reuniones locales, información y estadísticas relacionadas a la unidad de gobierno local que ha sido propuesta o que utiliza los fondos de financiamiento del programa de CDBG;

(3) Proveer información a los ciudadanos, incluyendo:

i. La cantidad de financiamientos del de CDBG que se espera sea otorgada en el año fiscal en curso (incluyendo las subvenciones y los ingresos anticipados del programa):
ii. El tipo de actividades probables a llevarse a cabo con el financiamiento del de CDBG:
iii. La cantidad estimada de financiamientos del de CDBG propuesta para ser usada en actividades que cumplirán con él objetivó nacional de beneficiar a personas de bajos recursos económicos; y
iv. Las actividades propuestas del programa de CDBG que son probables de resultar declinadas y la unidad general de gobierno y los planes de reemplazo requeridos bajo el Sec. 570.488

(4) Proveer asistencia técnica a grupos representativos de personas de bajos y moderados recursos que soliciten ayuda en el desarrollo de sus propuestas de acuerdo con el procedimiento desarrollado por el estado. Dicha asistencia no incluye proveer financiamiento a tales grupos;

(5) Participar en un mínimo de dos audiencias públicas, cada una en diferentes etapas del programa, con el propósito de obtener puntos de vista de los ciudadanos y responder a propuestas y preguntas. La audiencia en conjunto debe cubrir las necesidades de casa y desarrollo en la comunidad, desarrollo de actividades propuestas y la revisión del cumplimiento del programa. La audiencia pública que cubre el desarrollo de la comunidad y las necesidades de casa debe ser llevada a cabo en la fecha y lugares convenientes a beneficiarios actuales a potenciales, con lugares accesibles para discapacitados. Las audiencias publicas deben llevarse a cabo de cierta forma que cumplan las necesidades de residentes que no hablen Inglés ya que se espera que un numero razonable de estos participe en el programa.

(6) Informar a los ciudadanos con suficiente anticipación, y oportunidad de comentar al respecto, sobre actividades propuestas en solicitud al estado y, por subvenciones ya efectuados, actividades que sean propuestas para agregarse, eliminarse a ser cambiadas substancialmente de la solicitud de unidad general de gobiernos locales al estado. **Cambiadas substancialmente** significa que los cambios sean en términos de objetivó, alcance, lugar o beneficiario, como es definido bajo el criterio establecido por el estado.

(7) Proveer a los ciudadanos la dirección, el teléfono y las fechas y horario para entregar quejas y objeciones, y proveer oportunas respuestas por escrito a quejas entregadas por escrito, dentro de los primeros 15 días hábiles, cuando así pueda aplicarse.